

Louisville Metro Air Pollution Control District
850 Barret Ave., Louisville, Kentucky 40204
xx

Federally Enforceable District Origin Operating Permit
Statement of Basis

Company: ASG (AGI-Shorewood Group)

Plant Location: 4501 Allmond Avenue, Louisville, KY 40209

Date Application Received: 7/17/2006, 1/18/2007, 5/7/2010

Date of Public Notice: 11/15/2014

District Engineer: Chris Gerstle

Permit No: O-0885-14-F

Plant ID: 885

SIC Code: 2752

NAICS: 323111

AFS: 00885

Introduction:

This permit will be issued pursuant to District Regulation 2.17- *Federally Enforceable District Origin Operating Permits*. Its purpose is to limit the plant wide potential emission rates from this source to below major source threshold levels and to provide methods of determining continued compliance with all applicable requirements.

Jefferson County is classified as an attainment area for lead (Pb), nitrogen dioxide (NO₂), carbon monoxide (CO), 1 hr and 8 hr ozone (O₃), and particulate matter less than 10 microns (PM₁₀); and is a non-attainment area for particulate matter less than 2.5 microns (PM_{2.5}) and partial non-attainment for sulfur dioxide (SO₂).

Application Type/Permit Activity:

☐ Initial Issuance

☐ Permit Revision

☐ Administrative

☐ Minor

☐ Significant

☒ Permit Renewal

Compliance Summary:

☐ Compliance certification signed

☐ Compliance schedule included

☐ Source is out of compliance

☒ Source is operating in compliance

I. Source Information

1. **Product/Process Description:** The plant runs a lithographic printing press operation.
2. **Site Determination:** There are no other facilities that are contiguous or adjacent and under common control.
3. **Emission Unit Summary:**

Unit	Name
U1	Printing
IA1	Parts Washers

4. **Fugitive Sources:** There are no fugitive source emissions at this facility.
5. **Permit Revisions:**

Revision No.	Permit No.	Issue Date	Public Notice Date	Change Type	Change Scope	Description
Initial	127-01-F	11/05/2001	6/3/2001	Initial	Entire Permit	Initial Issuance
R1	O-0885-14-F	xx	11/15/2014	Renewal	Entire Permit	Permit Renewal; Removed equipment taken out of service; Incorporate Construction Permits

6. Plant-wide Emission Summary:

Pollutant	Potential Emissions (tpy)	Major Source Status (based on PTE)
CO	0	No
NO _x	0	No
SO ₂	0	No
PM/PM ₁₀	0	No
VOC	298.9	Yes
Single HAP (Xylene)	11.44	Yes
Total HAPs	15.48	No
GHG	0	No

7. Applicable Requirements:

☐ PSD ☐ 40 CFR 60 ☐ 40 CFR 63 ☒ SIP
☐ NSR ☐ 40 CFR 61 ☐ District-Origin ☐ Other

8. MACT Requirements:

The source has no future MACT regulations.

9. Referenced Federal Regulations in Permit:

None

II. Regulatory Analysis

1. **Acid Rain Requirements:** The source is not subject to the Acid Rain Program.
2. **Stratospheric Ozone Protection Requirements:** Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any facility that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. This source does not manufacture, sell, or distribute any of the listed chemicals. The source's use of listed chemicals is that in fire extinguishers, chillers, air conditioners and other HVAC equipment.
3. **Prevention of Accidental Releases 112(r):** The source does not manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR Part 68, Subpart F, and District Regulation 5.15, *Chemical Accident Prevention Provisions*, in a quantity in excess of the corresponding specified threshold amount. If the source becomes subject to 40 CFR 68 and Regulation 5.15, the source shall comply with the Risk Management Program and Regulation 5.15 and submit a Risk Management Plan to:
RMP Reporting Center
P.O. Box 3346
Merrifield, VA 22116-3346
4. **40 CFR Part 64 Applicability Determination:** The source is not subject to 40 CFR Part 64 - Compliance Assurance Monitoring for Major Stationary Sources.
5. **Basis of Regulation Applicability**

- a. **Plant-wide**

The source is a potential major source. Regulation 2.17 – *Federally Enforceable District Origin Operating Permits* establishes requirements to limit the plant wide potential emission rates to below major source threshold levels and to provide methods of determining continued compliance with all applicable requirements.

As defined by Regulation 5.00, section 1.13.5, in order to be an exempt stationary source in regards to STAR, the source has applied for an operating permit in accordance with Regulation 2.17 with emission limits that do not exceed the following:

Pollutant	Emissions (tpy)
VOC	25
Single HAP	5
Total HAP	12.5

Regulation 2.17, section 5.2 requires monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. The owner or operator shall maintain all the required records for a minimum of 5 years and make the records readily available to the District upon request.

Regulation 2.17, section 7.2, requires stationary sources for which a FEDOOP is issued shall submit an annual compliance certification by April 15. In addition, as required by Regulation 2.17, section 5.2, the source shall submit an annual compliance report to show compliance with the permit, by March 1 of the following calendar year. Compliance reports and compliance certifications shall be signed by a responsible official and shall include a certification statement per Regulation 2.17, section 3.5.

b. **Applicable Regulations:**

Regulation	Title	Type
6.18	Standards of Performance for Solvent Metal Cleaning Equipment	SIP
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	SIP

c. **Basis for Applicability**

Regulation	Basis for Applicability
6.18	Applies to cold cleaners.
7.25	Establishes VOC standards for affected facility constructed after June 13, 1979 for VOC.

d. **Emission Unit U1: Printing**i. **Equipment**

Emission Process	Description	Applicable Regulations	Install Date
E1	One (1) 8-color offset sheetfed lithography printing press (840-1 P94)	7.25 (BACT)	2000
E2	One (1) 8-color offset sheetfed lithography printing press (840-2 P104)	7.25 (BACT)	2001
E3	One (1) 2-color offset sheetfed lithography printing press (240-N-P27)	7.25 (BACT)	2006
E4	One (1) 6-color offset sheetfed lithography printing press (640-CD-P76)		2006
E5	One (1) 5-color offset lithography sheet-fed printing press (540C P540)		2008
E6	One (1) Ink Jet Printer		2010
E7	One (1) Ink Jet Printer		2010

ii. **Standards/Operating Limits**1) **VOC**

- (a) Per Regulation 7.25, for Emission Points E1 and E2, the owner or operator shall limit the VOC emissions to less than 10.8 ton per 12 consecutive month period, per press.
- (b) Per Regulation 7.25, VOC emissions from Emission Points E1 through E7, the owner or operator shall limit the VOC emissions to less than 25 tons per 12 consecutive month period. (A BACT determination is required to be performed for any future construction/modification subject to Regulation 7.25 for any emissions outside of the 25 tpy limit.)

e. **Emission Unit IA1: Parts Washers**i. **Equipment**

Emission Process	Description	Applicable Regulations	Install Date
E8	Cold Solvent Parts Washer	6.18	2001
E9	Cold Solvent Parts Washer		2001

ii. **Standards/Operating Limits**

1) **VOC**

Per Regulation 6.18, the owner or operator shall install, maintain, and operate the control equipment for Emission Points E8 and E9, shall observe specific operating requirements, and shall not operate a cold cleaner using a solvent with a vapor pressure that exceeds 1.0 mm Hg (0.019 psi) measured at 20°C (68°F).

III. Other Requirements

1. **Temporary Sources:** The source did not request to operate any temporary facilities.
2. **Short Term Activities:** The source did not report any short term activities.
3. **Emissions Trading:** N/A
4. **Operational Flexibility:** The source did not request any operational flexibility.
5. **Compliance History:** There are no records of any violations of the terms of the present or prior construction or operating permits.
6. **Calculation Methodology:**
Printing (U1): Using the VOC and HAP content from Material Safety Data Sheets (MSDS) of the inks, solvents, and cleaners, etc. emissions are calculated based upon the press operating hours and material usages.

7. **Insignificant Activities:**

Equipment	Qty.	PTE (tpy)	Regulation Basis
Cold solvent parts cleaner with secondary reservoir	1	0.0002 (VOC)	Regulation 1.02, Appendix A
Cold solvent parts cleaner, no secondary reservoir	1	0.09 (VOC)	Regulation 1.02

- 1) Insignificant Activities identified in District Regulation 1.02 Appendix A may be subject to size or production rate disclosure requirements.
 - 2) Insignificant Activities identified in District Regulation 1.02 Appendix A shall comply with generally applicable requirements.
 - 3) The owner or operator shall annually submit an updated list of insignificant activities that occurred during the preceding year, with the compliance certification due April 15th.
 - 4) Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
 - 5) The owner or operator may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions, or use Potential to Emit (PTE) as the annual emissions for each piece of equipment.
 - 6) The District has determined that no monitoring, record keeping, or reporting requirements apply to the insignificant activities listed, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.
8. **Permit Fee:** On May 15, 2013, the Board approved revisions to Regulation 2.08, which implemented a new fee structure. As a result, the source will be required to pay an annual fee.